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Sundeep Gill et al.

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

SUNDEEP GILL ET AL.,

Plaintiff,

vs.

MARK GUERRA ET AL.,

Defendants.

3:18-CV-09750-BRM-DEA

STIPULATION – Extension of Time

WHEREAS, SUNDEEP GILL et al., (“Plaintiff”) filed a complaint in the above-captioned action on May 25, 2018 (the “Complaint”);

WHEREAS, Defendants Mark Guerra and The Brook Valley Group, Inc. (collectively, “Defendants”) were served with the summons and Complaint on June 7, 2018;

WHEREAS, the original time for Defendants to respond to the Complaint in this action is June 28, 2018;

WHEREAS, counsel for the Defendants and Plaintiff are engaged in discussions related to the possibility of resolving this action, and additional time is necessary to advance these discussion or respond to the Complaint;

WHEREAS, Defendants and Plaintiff respectfully request an additional thirty days (30) days to answer, move, or otherwise appear in this action until, and including September 27,

2018;

WHEREAS, this is the second request for an extension of time to answer, move, or otherwise appear in this action; and

WHEREAS, both Plaintiff and Defendants agree to this extension;

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff and Defendants, through their counsel, that:

1. The deadline for Defendants to serve and file their respective answer, motion, or response to the Complaint will be September 27, 2018; and
2. Entry into this Stipulation shall not prejudice any rights, claims, or defenses of any party in the above-captioned action, and all such rights, claims, and defenses are expressly preserved.

Dated: August 22, 2018

Respectfully submitted,

JAMES M. SMEDLEY LLC

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*Attorneys for Mark Guerra &
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Attorneys for Plaintiffs

SO ORDERED

Hon. Brian R. Martinotti, U.S.D.J.
Dated: September __, 2018

Trenton, New Jersey